

JONATHAN O. PENA, ESQ.  
CA Bar ID No. 278044  
Peña & Bromberg, PLC  
2440 Tulare St., Suite 320  
Fresno, CA 93721  
Telephone: 559-412-5390  
Fax: 866-282-6709  
info@jonathanpena.com  
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

Damarin Pthlong,	)	Case No. 1:22-cv-01558-ADA-GSA
Plaintiff,	)	
vs.	)	STIPULATION AND ORDER FOR
	)	EXTENSION OF TIME
Kilolo Kijakazi, Acting	)	
Commissioner of Social Security,	)	
Defendant.	)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from April 20, 2023 to June 20, 2023, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Good cause exists for the requested extension. For the weeks of April 17 2023 and April 24, 2023, Counsel currently has 12 merit briefs, and several letter briefs and reply

1 briefs. This includes cases that undersigned counsel took on during co-counsel's,  
2 Dolly M. Trompeter, leave of absence. Additional time is needed to thoroughly  
3 brief this matter for the Court.

4 Counsel for Plaintiff is currently taking partial leave as his child was born on  
5 October 14, 2022. Thus, Counsel is working limited hours.

6 Additionally, Counsel underwent major surgery on March 15, 2023,  
7 requiring post-op physical therapy, with the need for several breaks throughout the  
8 workday.

9 Defendant does not oppose the requested extension. Counsel apologizes to  
10 the Defendant and Court for any inconvenience this may cause.

11  
12  
13 Respectfully submitted,

14 Dated: April 2, 2023

PENA & BROMBERG, ATTORNEYS AT LAW

15  
16 By: /s/ Jonathan Omar Pena  
17 JONATHAN OMAR PENA  
18 Attorneys for Plaintiff

19  
20 Dated: April 2, 2023

21 PHILLIP A. TALBERT  
22 United States Attorney  
23 MATHEW W. PILE  
24 Associate General Counsel  
25 Office of Program Litigation  
26 Social Security Administration

27 By: \*/s/ Franco Becia  
28 Franco Becia  
Special Assistant United States Attorney  
Attorneys for Defendant

(\*As authorized by email on April 2, 2023)

**ORDER**

Pursuant to stipulation,

IT IS SO ORDERED.

Dated: April 4, 2023

/s/ Gary S. Austin  
UNITED STATES MAGISTRATE JUDGE